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June 9, 2006

Mr. Dan Pitman
Air Quality Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

SUBJECT: Applications for Renewal of Tier I Air Operating Permits
Basic American Foods Blackfoot and Rexburg Plants

Dear Mr. Pitman:

On behalf of Basic American Foods (BAF), Coal Creek Environmental Associates is submitting the enclosed Tier I Air Operating Permits for BAF's Blackfoot and Rexburg Plants. These applications have been certified by a responsible official of BAF on page 2-1.

Please contact either Bruce Wright of Basic American Foods or me if you have questions or need additional information.

Yours truly,

This copy includes errata pages received July 5, 2006.

Stephen J. Nelson, PE
Manager
Coal Creek Environmental Associates, LLC

Attachment

Cc: BAF – Bruce Wright
Keith Keller
Deloris Aguilar

RECEIVED

JUN 12 2006

Department of Environmental Quality
State Air Program

BASIC AMERICAN FOODS

APPLICATION FOR RENEWAL OF TIER I AIR OPERATING PERMIT

REXBURG FACILITY OF BASIC AMERICAN FOODS (A DIVISION OF BASIC AMERICAN, INC.)

This copy includes errata pages. ZK

June 2006

Coal Creek Environmental Associates, LLC
4621 118th Ave SE
Bellevue, WA 98006

RECEIVED
JUN 12 2006
Department of Environmental Quality
State Air Program

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1. INTRODUCTION AND CERTIFICATION BY RESPONSIBLE OFFICIAL

This document is an Application for renewal of Tier I Air Operating Permit No. 065-00008 ("the current Tier I Permit") for the Basic American Foods (BAF) Rexburg Plant located in Rexburg, ID (AIRS Facility No. 065-00008). This application includes information required pursuant to IDAPA 58.01.01, Section 314.

Appendix A contains Completeness Determination forms for the application. Section 2 and Appendix B of this Application contain information requested in Section 1 of the Idaho Department of Environmental Quality (DEQ) Air Quality Operating Permit Application Forms. Additional descriptions of facility operations and emissions are included in subsequent sections of the application.

2. GENERAL INFORMATION FOR THE FACILITY

Company and Division Name	Rexburg Facility of Basic American Foods, a Division of Basic American, Inc..
Street Address	40 East 7th North Rexburg ID 83274
Exact Plant Location	40 East 7th North Rexburg ID 83274
Contact Person	Deloris Aguilar Idaho Environmental Manager (208)785-8306
General Nature of Business/Product	Dehydrated food products and animal feed
Number of full-time employees and property area	180 employees 280 acres
Reason for Application	2 – Tier I Permit to Operate
Distance to Nearest State Border	40 miles
Primary and Secondary SIC	2034
Plant Location County	Madison
Elevation	4863' MSL
UTM Zone UTM X (Easting) UTM Y (Northing)	12 437 4854
Name and Location of Other Facilities	Blackfoot Facility of Basic American Foods, a Division of Basic American, Inc. Shelley Facility of Basic American Foods, a Division of Basic American, Inc.
Responsible Official	Nelson Rovig, Director, Idaho Operations

In accordance with IDAPA 58.01.01.123 (*Rules for the Control of Air Pollution in Idaho*), I, Nelson Rovig, certify based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Signature: Nelson Rovig Date: 6/9/06

GENERAL DESCRIPTION OF PROCESSES USED AND PRODUCTS PRODUCED

The Rexburg Facility is located in unincorporated land immediately north of the Rexburg City Limits. The Rexburg Facility is bounded on the south by the South Fork of the Teton River, and on the east by the Union Pacific Railroad tracks. Access to the Rexburg Facility is from North Salem Road at East 7th North.

The Rexburg Facility is a food drying and dehydrating plant. A portion of the Rexburg Facility is leased to Idaho Fresh Cooperative as a fresh potato packing operation. This portion of the Rexburg Facility is operated by Rexburg Fresh, a district member of the Idaho Fresh Cooperative.

Figure 2-1 shows the Rexburg Facility location on a USGS map. Figure 2-2 is a site plan of the Rexburg Facility.

PRODUCTS

Plant products are described below.

- Dehydrated potato granules.

  Potato granules are individual potato cells prepared from raw potatoes by cooking, followed by gentle drying. Granules typically range from 50 to 120 microns in size. Granules produced at the Rexburg Facility are either used at the Rexburg Facility, are packaged for sale, or are shipped to other BAF facilities for use in products produced at those plants.

- Formulated dehydrated food products.

  Formulated products are prepared from various combinations of dried ingredients, fresh and fresh-cooked ingredients, and food additives. BAF dries these formulations to create final products.

- Dehydrated whole and piece food products

  BAF prepares dehydrated whole and piece food products by dehydrating cooked and/or blanched foods. These foods can be either whole vegetables or vegetable pieces. Piece products range up to several inches in diameter.

- Animal feed.

  Animal feed, consisting of food fractions and off-specification materials that are not suitable for use in other products, is produced as a co-product of other plant processes. BAF uses various materials classification processes to segregate, collect, and transport animal feed. Animal feed is transferred directly to load out operations after collection without further processing.

RAW MATERIALS

Rexburg Facility raw materials include uncooked food products, dehydrated food products produced at this or other locations and various additives and flavorings used in Rexburg Facility products. BAF receives fresh potatoes both directly from producers and from Rexburg Fresh.

Fresh potatoes can be either processed directly or stored in cellars on-site, pending packing or processing.

PRODUCTION PROCESSES

BAF uses a variety of drying and dehydration processes. Products are dried by contact with heated air. Drying air is heated either by direct-firing with natural gas or indirectly using steam heat exchangers. Air suspension unit processes are also used to classify materials and to remove unsuitable fractions from the production stream.

MATERIALS TRANSPORT ACTIVITIES

Materials transport occurs both internally within a processing activity and externally to transfer materials between processes, to place them into or take them out of bulk storage, or to transport them to packaging and load out activities. BAF uses air suspension systems to transport granules and most formulated products; these suspension processes include air slides and pneumatic bulk transfer operations. BAF also uses belt and bucket conveyors at various locations in its operations to transport raw materials, products in processing, and finished products. All bucket and belt conveyors are entirely contained within enclosed buildings. BAF also uses wet flumes to transport raw potatoes. Fork lifts are used to transfer tote containers within the plant.

Materials recovery units (primarily cyclones) are integral to the operation of all unit processes in which granules or formulated products are suspended in air.

SHIPPING AND RECEIVING

Raw materials are received on site by truck. All shipments are by truck or rail. Trucks are also used to move potatoes to and from the on-site cellars.

FUEL USAGE

Wood is the primary fuel used to produce steam, with supplemental steam generation using natural gas. Coal can also be used for steam generation. Natural gas is the sole fuel used for direct heated processes. Facility heating is by natural gas.

GENERAL DESCRIPTION OF EACH PROCESS LINE

For purposes of the Tier I Air Operating Permit, activities at the plant are divided into four process activities. Each of the processes is described generally below. Additional details of process operations are presented in Section 3. Figure 2-3 is a plantwide process schematic.

PLANT

The "Plant" Process includes site activities that are plant-wide in nature or that are not associated with a specific production process at the Rexburg Facility. The Plant Process includes overall facility management, wood fuel receiving and storage, utility services, shipping and receiving, operation of potato storage cellars, space heating and cooling, analytical laboratories, spray field operations, and maintenance and grounds-keeping activities.

BOILERS

Three boilers provide process steam for the Rexburg Plant from the combustion of fuel. Fuels combusted can include wood waste, coal, and natural gas.

PROCESS A

Process A produces dehydrated potato products via a series of cooling, drying, and materials separation processes. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

PROCESS B

Process B produces dehydrated food products. It also includes materials transport and packaging processes. Products are produced via a series of cooling, drying, and materials separation processes. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

CHANGES IN PROCESSES AND OPERATIONS SINCE THE CURRENT TIER I PERMIT WAS ISSUED

The current Tier I Permit was issued to the BAF Rexburg facility on December 11, 2002. There have been no changes in permitted facilities and operations since the current Tier I Permit was issued.

In May 2003 BAF submitted an Application for Tier II Air Operating Permit for the Rexburg Facility. In May 2004, BAF submitted a revision to the May 2003 Tier II Air Operating Permit for the Rexburg Facility. The May 2004 Revision included

information on co-firing coal with wood waste in the Kipper Boiler. The Tier II Permit has not been issued for the facility.

3. EMISSIONS INVENTORY AND DESCRIPTIONS OF EMISSIONS UNITS

This section presents a plantwide emissions inventory, based on maximum potential emissions. The inventory includes emissions from both significant and insignificant emissions units.

Descriptions of emission units follow the emissions inventory. The discussions of emissions units are organized by plant process line.

EMISSIONS INVENTORY

Air emissions from the Rexburg Plant are associated with the following activities:

- Products of combustion associated with process steam generation in plant boilers;
- Products of combustion associated with firing natural gas to supply heated air to dryers;
- Food and food product particulates generated by drying operations;
- Food product particulates incompletely recovered from air suspension materials transport processes.
- Conversion of sulfite to sulfur dioxide in drying processes.
- Fugitive dust generated by vehicle traffic.

Tables 3-1 and 3-2 present estimated potential annual emissions for particulate matter (PM) and for criteria pollutants associated with each emissions unit.

The only activity at the Rexburg Plant that produces Hazardous Air Pollutant (HAP) emissions is fuel combustion. Table 3-3 summarizes HAP emissions from plant fuel combustions As Table 3-3 indicates maximum potential HAP emissions are 8.4 tons year, which is below the levels at which the plant would be a major source of HAPs emissions (10 tons per year for any given HAP or 25 tons per year for all HAPs combined).

Appendices B and C provide calculation details for the emission estimates in Tables 3-1 through 3-3, including emission factors selected, hourly emission rates, and calculation details.

DESCRIPTIONS OF EMISSIONS UNITS

Plant production processes were previously listed in Section 2. This section of the Tier I permit application describes each of these processes in more detail.

The information presented for each process includes:

- A description of process operations
- A list of emissions units associated with the process, separated into significant and insignificant emissions units.
- Identification and quantification of fuels, fuel use, raw materials, production rates, and operating schedules needed to determine or regulate emissions.
- Identification and description of air pollution control equipment and compliance monitoring devices and activities.
- Identification and description of all limitations on source operation and all work practice standards affecting emissions.

PLANT

DESCRIPTION OF PROCESS OPERATIONS

The "Plant" Process includes site activities that are plant-wide in nature or that are not associated with a specific production process at the Rexburg Facility. The Plant Process includes overall facility management, wood fuel receiving and storage, utility services, shipping and receiving, operation of potato storage cellars, space heating and cooling, analytical laboratories, spray field operations, and maintenance and grounds-keeping activities.

Fugitive emissions sources associated with the Plant Process include dust and volatile organic compound (VOC) emissions from the wood fuel pile, combustion emissions from gas-fired space heaters and dust emissions from vehicle traffic on-site.

There are 18 individual space heaters at the Rexburg Facility, in sizes ranging from less than 100,000 Btu/hr to 8.8 MMBtu/hr with a total combustion capacity of 30.8 MMBtu/hr. The space heaters are potential sources of carbon monoxide, nitrogen oxides, particulates, sulfur dioxide, volatile organics and certain HAPs and TAPs associated with fuel combustion.

Vehicle traffic on plant roads is a potential source of fugitive dust emissions.

The wood fuel pile is a potential source of dust and VOC emissions.

SIGNIFICANT EMISSIONS UNITS

The Plant process includes the following significant emissions units:

Emissions Unit Identification	*Description of Unit*
REYCO – Shop roof	Direct fired, natural gas 8.8 MMBtu/hr capacity. Installed 1997.

Emissions Unit Identification	Description of Unit
REYCO – Proctor Roof	Direct fired, natural gas 8.8 MMBtu/hr capacity. Installed 1997.
Fugitive	The wood fuel storage pile is the main area for receiving chips and fuel particles. Wood is moved from the yard to a series of conveyors, which feed the stoker hoppers.

INSIGNIFICANT EMISSIONS UNITS

The following "Plant" process activities are insignificant emissions units on the basis of size or production rate, per IDAPA 58.01.01, Section 317.01.b:

- Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closure and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.
- Operation, loading and unloading of storage tanks not greater than 1,100 gallons capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of five hundred fifty (550) mm Hg.
- Operation, loading and unloading of volatile organic compound storage tanks, 10,000 gallons capacity or less, with lids or other appropriate closure and vapor pressure not greater than 80 mm Hg at 21 deg. C.
- Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas (LPG) in storage tanks or vessels less than 40,000 gallons capacity.
- Operation, loading and unloading of gasoline storage tanks, 10,000 gallons capacity or less, with lids or other appropriate closure.
- Combustion sources, less than 5 million BTU/hr, exclusively using natural gas, butane, propane, and/or LPG.
- Welding using not more than one ton/day of rod.
- "Parylene" coaters using less than 500 gallons of coating per year.
- Printing and silkscreening, using less than 2 gallons per day of any combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.
- Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gallons per minute, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.
- Industrial water chlorination, less than 20 MGD capacity.

- Surface coating, using less than 2 gallons per day.
- Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than 5,000,000 BTU/hr.
- Tanks, vessels and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99 per cent or greater sulfuric or phosphoric acid; 77 per cent or greater nitric acid; 30 per cent or greater hydrochloric acid; or more than one liquid phase where the top phase is more than one per cent volatile organic compounds.
- Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload or store high boiling point organic material, with initial boiling point not less than 150 deg. C or vapor pressure not more than 5 mm Hg at 21 deg. C.
- Milling and grinding activities (paste forms, if used, are less than one per cent volatile organic compounds).
- Rolling, forging, drawing, stamping, shearing, and spinning metals.
- Dip-coating operations using materials with less than one per cent volatile organic compounds.
- Surface coating, aqueous solution or suspension containing less than one per cent volatile organic compounds.
- Cleaning and stripping activities and equipment, using solutions having less than one per cent volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).
- Storage and handling of water based lubricants for metal working with organic content less than 10 percent.

The aggregate burner capacity of all plant space heaters (including both significant and insignificant emissions units) is 30.8 MMBtu/hr. For purposes of the air emissions inventory, all plant space heaters are aggregated into a single emissions unit with a burner capacity of 30.8 MMBtu/hr. Emissions unit information for space heaters in aggregate is presented in Appendixes B and C.

Plant space heaters are designed and sized for comfort space heating during cold weather periods. For purposes of estimating hourly emissions, all plant heaters are assumed to operate at maximum firing rates simultaneously. During warm weather periods the heaters do not operate; in fact, due to the amount of heat released into the building by production processes, extensive cooling of air is required to maintain temperatures suitable for plant operations during warm weather periods. Accordingly, the space heaters operate at no more than 50 per cent of firing capacity on an annual basis. This is a practical and effective limit on operations, as higher operating rates are an operating condition that is contrary to design and that would be detected and corrected.

BOILERS

PROCESS DESCRIPTION AND OPERATIONS

Three boilers provide process steam for the Rexburg Plant. The Kipper Boiler, one of the three boilers, is operated pursuant to a *Permit to Construct* issued by the Idaho Department of Health and Welfare on July 30, 1980.

The Kipper Boiler is fired by wood waste and is also permitted to fire wood-coal mixtures with coal up to 39% of the total weight of fuel. Boilers 1 and 2 combust natural gas. Figure 3-1 is a process flow diagram for boiler operations.

The boilers are potential sources of nitrogen oxides, particulates, sulfur dioxide, volatile organics, and carbon monoxide. Minimal amounts of hazardous air pollutants and lead associated with fuel combustion are emitted from this process.

SIGNIFICANT EMISSIONS UNITS

Each boiler is a point source of emissions. Information on each boiler is summarized in the Emissions Unit Data Tables in Appendix B. This process includes the following significant emissions units:

Emissions Unit	Description of Unit
Kipper Boiler	The Kipper Boiler is a 60,000 lb/hr wood-fired boiler manufactured by Kipper and Sons, Inc. The boiler is also permitted to fire wood-coal mixtures with coal up to 39% of the total weight of fuel.
Boiler 1	Boiler 1 is an Erie City unit, with a rated steam output of steam rate of 40,000 lb/hr and a maximum estimated heat input of 52 MMBTU/hr.
Boiler 2	Boiler 2 is an Erie City unit, with a rated steam output of steam rate of 26,500 lb/hr and a maximum estimated heat input of 35 MMBTU/hr.

INSIGNIFICANT EMISSIONS UNITS

There are no insignificant emissions unit associated with the Boilers process. Insignificant activities associated with the boiler process are included in the insignificant activities listed provided above for plantwide activities.

EMISSION LIMITS

There are no emissions limits from boilers established by permit or order. Emissions from boilers are subject to generic regulatory enforceable limits listed below:

- Visible emissions from the Kipper Boiler and from Boilers 1 and 2 may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.
- For Boilers 1 and 2, particulate matter emissions may not exceed 0.015 gr/dscf (corrected to 3% oxygen by volume) when combusting gas fuel.
- For the Kipper Boiler, particulate matter emissions to the atmosphere may not exceed 0.05 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal fuel and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood product fuel in accordance with IDAPA 58.01.01.676-677.

OPERATING REQUIREMENTS

Boiler operations are subject to the operating requirements listed below.

- The Kipper Boiler is allowed to combust coal:wood mixtures with the amount of coal in the mixture limited to no more than 39% by weight.
- The sulfur content of any coal fired is limited to 1% by weight.

BAF's 1995 Tier I Operating Permit Application for the Rexburg Facility indicated that the Kipper Boiler was limited to 8568 hours per year of operation. This limitation was also included in the Tier I Air Operating Permit issued to the Rexburg Facility in December 2002. The PTC issued for the Kipper boiler did not contain any such limitation on the hours of operation, nor was any limitation on operating hours included in the application for the PTC. Accordingly, this limit on hours of boiler operation appears to have been erroneously included in the Tier I Permit Application and the subsequently issued Tier I Permit. BAF requests that the Tier I permit correct this oversight by removing limitations on hours of operation of the Kipper Boiler.

AIR POLLUTION CONTROL EQUIPMENT AND COMPLIANCE MONITORING DEVICES AND ACTIVITIES

To control particulate emissions, the Kipper boiler uses multiclones (Zurn type MTSA-60-9 CYT-STD-XT multiclone with 112 tubes) with fly ash reinjection and a ventri-rod wet scrubber (Riley Model A-33-34,000). Details of these emissions controls are presented in the Application for Permit to Construct for this boiler.[1]

[1] AMPCO Foods, Inc., "Application to Idaho Division of Environment to Construct and Operate One 60,000 Pounds Per Hour Wood and Wood-Coal Mixed Fired Boiler at the Rexburg Plant, Rogers Division of American Potato Company", July 3, 1980.

PROCESS A

PROCESS DESCRIPTION AND OPERATIONS

Process A produces dehydrated potato products. Raw material input to the process is cooked potatoes and food additives, including sulfites. Products are produced via a series of cooling, drying, and materials separation processes, as illustrated in the process flow diagram for Process A (Figure 3-2). The maximum hourly feed rate is 30,600 pounds per hour, average hourly feed rate on the maximum day, with a maximum production rate of 5,100 pounds per hour, average hourly production on the maximum day. Process A can operate up to 8,760 hours per year. Maximum annual production is 45 million pounds. There are no alternate operating scenarios.

Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

Emissions from Process A include both process emissions and products of combustion from those sources that combust natural gas as part of the process. Process emissions include:

- PM and PM-10, associated with entrainment and condensation of particulates in exhaust air streams; and
- Sulfur dioxide, associated with conversion of sulfites to sulfur dioxide.

Emissions that are products of natural gas combustion include CO, NOx, SO_2, PM, PM-10, VOC, Pb, and certain HAPs and TAPs.

Process A was constructed in the early 1960s.

SIGNIFICANT EMISSIONS UNITS

Process A includes the following significant emissions units:

Emissions Unit	Description of Unit
7020	Stack 7020 is a vent from a cooler used to cool wet cooked food solids prior to further processing. The air supply to the cooler is unconditioned room air. This unit can operate up to 8760 hours per year.
7101	Stack 7101 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 6.5 MMBTU/hr.

Emissions Unit	Description of Unit
7102	Stack 7102 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas combustion. The burners are rated at 6.5 MMBTU/hr.
7019	Stack 7019 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by both steam and natural gas combustion. The gas burners in the dryer are rated at 6.6 MMBTU/hr.

INSIGNIFICANT EMISSIONS UNITS

The following Process A activities are insignificant emissions units on the basis of size or production rate, per IDAPA 16.01.01.317.01b:

- 7001
- 7027
- 7006

Insignificant activities associated with the boiler process are included in the insignificant activities listed provided above for plantwide activities.

EMISSION LIMITS

There are no limits on emissions from Process A established in Permits or Orders. Emissions from Process A are subject to the following general limits established by regulations:

- PM emissions

  A source operating prior to October 1, 1979 may not discharge PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

  - If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$
  - If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

- Visible emissions

  Visible emissions from any point of emission may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.

OPERATING REQUIREMENTS

There are no applicable operating requirements for Process A.

AIR POLLUTION CONTROL EQUIPMENT AND COMPLIANCE MONITORING DEVICES AND ACTIVITIES

Process A does not have any required air pollution control equipment or compliance monitoring devices and activities.

PROCESS B

PROCESS DESCRIPTION AND OPERATIONS

Process B produces dehydrated food products. It also includes materials transport and packaging processes. Raw material inputs to Process B include cooked foods, previously dehydrated foods, and food additives, including sulfites.

Products are produced via a series of cooling, drying, and materials separation processes, as illustrated in the process flow diagram for Process B (Figures 3-3a through 3-3d). The aggregate maximum hourly feed rate for dehydration activities is 70,000 pounds per hour, average hourly input on the maximum day, with an aggregate maximum production rate of 25,300 pounds per hour, average hourly production on the maximum day. The aggregate maximum annual production from dehydration activities is 221,600,000 pounds. The packaging and materials transport activities can operate at an aggregated rate of up to 30,400 pounds per hour, with aggregated maximum material handling of 266,000,000 pounds per year. Process B can operate up to 8,760 hours per year.

Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

Emissions from Process B include both process emissions and products of combustion from those sources that combust natural gas as part of the process. Process emissions include:

- PM and PM-10, associated with entrainment and condensation of particulates in exhaust air streams; and
- Sulfur dioxide, associated with conversion of sulfites to sulfur dioxide.

Emissions that are products of natural gas combustion include CO, NOx, SO_2, PM, PM-10, VOC, Pb, and certain HAPs and TAPs.

SIGNIFICANT EMISSIONS UNITS

Process B includes the following significant emissions units:

Emissions Unit	Description of Unit
5037	Stack 5037 is a combined vent from a dryer and a cooler both used to dry and cool food solids as part of a dehydrated food production process. The dryer is heated by steam.
4000	Stack 4000 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam.
228	Stack 228 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by natural gas, with total burner capacity of 16.1 MMBtu/hr.
410/411	Stack 228 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam.
613/614	Stack 228 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam.
615/616	Stack 228 is a vent from a dryer used to dry food solids as part of a food dehydration process. The dryer is heated by steam.
572	Stack 572 is a vent from a materials recovery cyclone that is part of a pneumatic transfer system in the animal feed load-out system.

INSIGNIFICANT EMISSIONS UNITS

The following Process B activities are insignificant emissions units on the basis of size or production rate, per IDAPA 16.01.01.317.01b:

- 5034
- 234
- 311
- 312
- 638
- 707
- 725
- 8
- 5001
- 5000
- 432
- 322
- 572

Insignificant activities associated with the boiler process are included in the insignificant activities listed provided above for plantwide activities.

EMISSION LIMITS

There are no limits on emissions from Process A established in Permits or Orders. Emissions from Process A are subject to the following general limits established by regulations:

- PM emissions

A source operating prior to October 1, 1979 may not discharge PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$
- If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

- Visible emissions

  Visible emissions from any point of emission may exceed 20 percent opacity for no more than an aggregate of three minutes in any 60-minute period.

OPERATING REQUIREMENTS

There are no applicable operating requirements for Process B.

AIR POLLUTION CONTROL EQUIPMENT AND COMPLIANCE MONITORING DEVICES AND ACTIVITIES

Process B does not have any required air pollution control equipment or compliance monitoring devices and activities.

4. APPLICABLE REQUIREMENTS IDENTIFICATION AND COMPLIANCE CERTIFICATION

This section identifies applicable requirements, evaluates the status of compliance with each applicable requirement, and provides the basis for demonstrating and reporting continuing compliance. Applicable requirements are grouped into the following categories:

- Emission Limits
- Operating Requirements,
- Monitoring Requirements
- Recordkeeping Requirements
- Reporting Requirements

This section includes applicable requirements that are contained in a regulation, construction permit, Tier II permit, court order, or other enforceable requirement other than a Tier I permit. This section does not include existing monitoring, recordkeeping, and reporting requirements that are applicable only as "gap-filling" requirements established in the current Tier I permit pursuant to IDAPA 58.01.01.322.

Where a single applicable requirement (such as a regulation or a permit condition) includes requirements in more than one of these areas, the applicable requirement is cited in each relevant category. Also note that that an applicable requirement can also be a monitoring, recordkeeping, or reporting requirement for another applicable requirement.

Applicable requirements are listed organized by process (as described in Section 2, above) and emissions unit(s). Within each process and emissions unit, applicable requirements are grouped as described above.

The discussion for each identified applicable requirement includes the following information:

- The affected parameter
- Identification of whether the requirement is federally enforceable or is a "state-only" requirement. [2]
- The regulatory citation for the requirement
- A description of the applicable requirement

[2] "Federally enforceable" means that the applicable requirement can be enforced by the federal government. This means that the requirement is either a part of federal law, or, if it is a State or local requirement, the requirement is included in the Idaho State Implementation Plan (40 CFR 52, Subpart N). A "state only" requirement is a state or local requirement that is not part of the Idaho State Implementation Plan.

- Citations to any applicable monitoring, recordkeeping, and reporting requirements.[3]
- Evaluation of current compliance status and the basis for determining current compliance status
- A compliance plan for the applicable requirement.

PLANT

This section identifies and discusses compliance with requirements that apply to overall plant operations. Requirements that apply generically to all emissions units or emissions activities (such as general limits on visible emissions and reporting requirements for excess emissions) are included in the Plant process.

The "Plant" process is divided in the following three "emissions units", which reflect the applicability for rules that apply to overall plant operations:

- General Plantwide Activities
- All Emissions Units (Generic)
- Indirect Fired Combustion Units (Generic)

GENERAL PLANTWIDE ACTIVITIES

The "general plantwide activities" emissions unit incorporates all plant activities that are subject to applicable requirements but for which the regulated activity is not a stack emission. This includes required plant management activities and all plant fugitive emissions.

EMISSIONS LIMITS - GENERAL PLANTWIDE ACTIVITIES

There are no plantwide emission limits.

OPERATING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

The following operating requirements apply generically to plant activities.

[3] To reduce the volume of the application, citations are used for monitoring, recordkeeping and reporting requirements that are in reference materials that are currently applicable and available to the public. This includes requirements that are published in the Code of Federal Regulations, the Idaho Administrative Code, and applicable requirements that are described elsewhere in this application. See Section II.F.1 "Cross-Referencing" of EPA guidance for Development of Clean Air Act Part 70 Permit Applications (Issued July 10, 1995).

Fugitive Dust

IDAPA 58.01.01.651

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with provisions of the current Tier I Permit, BAF monitors and maintains records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to control fugitive emissions. BAF has also formalized its procedures to maintain records of all fugitive dust complaints and the BAF Idaho Environmental Superintendent conducts routine quarterly monitoring of the plant for fugitive dust emissions. The BAF Idaho Environmental Superintendent also observes plant dust conditions as part of other plant activities.

Since the existing Tier I permit was issued, the plant has not recorded any fugitive dust complaints. In addition, the BAF Idaho Environmental Superintendent has not observed any fugitive dust leaving the plant site.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to maintain records of all fugitive dust complaints received. BAF will take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records will include, at a minimum, the date each complaint was received and a description of the following: the complaint, BAF's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

BAF will continue to conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to insure that all reasonable precautions are being taken to prevent fugitive emissions. If fugitive emissions are observed, BAF will review operations to insure that all reasonable precautions are being taken to prevent fugitive emissions. If fugitive emissions are not being reasonably controlled, BAF will take corrective action as expeditiously as practicable. BAF will maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Reporting Methods and Frequencies

Results of visible emissions monitoring will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Toxic Air Pollutants

IDAPA 58.01.01.161

Any contaminant which is by its nature toxic to human or animal life or vegetation shall not be emitted in such quantities or concentrations as to alone, or in combination with other contaminants, injure or unreasonably affect human or animal life or vegetation.

Enforceability

State-Only

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In May 2003, BAF submitted an application for Tier II Operating Permit for the Rexburg Plant. BAF submitted Revision #1 to this Application in May 2004. These applications included detailed reviews documenting compliance with Idaho rules for emissions of Toxic Air Pollutants.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF's approval process for capital projects includes review of potential air emissions permitting requirements. This review includes assessment of compliance with IDAPA 58.01.01.210 and 223. BAF will annually review capital projects to verify that permitting applicability reviews were completed for projects that could affect air emissions.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Sulfur Content of Fuels

IDAPA 58.01.01.725-729

No person shall sell, distribute, use or make available for use, any fuel containing more than the following amounts of sulfur:

- residual fuel oil: one and three-fourths percent (1.75%) sulfur by weight.
- ASTM Grade 1 fuel oil: 0.3 percent by weight.
- ASTM Grade 2 fuel oil: 0.5 percent by weight.
- coal: one percent (1.0%) sulfur by weight.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.725

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

The only plantwide use of fuel oil is miscellaneous combustion of diesel fuel in vehicle engines. All vehicles are refueled at off-site commercial fueling stations, all of which are also subject to this requirement. No fuel oil is stored on-site and no refueling of vehicles with diesel fuel occurs on site.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF does not sell or distribute any fuel oil. The only fuel oil used is diesel fuel for internal combustion engines on mobile sources, all of which was purchased at off-site commercial fueling stations.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if

compliance cannot be certified, will provide an appropriate compliance schedule.

Odors

IDAPA 58.01.01.776

No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution.

Enforceability

State-Only

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Pursuant to the current Tier I permit, BAF maintains records of all odor complaints received. The records include the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

In the last four years, BAF has not received any odor complaints related to plant operations.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to maintain records of all odor complaints received. If the complaint has merit, BAF will take appropriate corrective action as expeditiously as practicable. The records will include the date each complaint was received and a description of the following:

- the complaint,
- the BAF's assessment of the validity of the complaint,
- any corrective action taken,
- the date the corrective action was taken.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Open Burning

IDAPA 58.01.01.603

No person shall allow, suffer, cause or permit any open burning operation unless it is a category of open burning set forth in IDAPA 58.01.0. 600 through 617 and the materials burned do not include any items prohibited by IDAPA 58.01.01.603.

No person shall allow, suffer, cause or permit any open burning to be initiated during any stage of an air pollution episode declared by the Department in accordance with IDAPA 58.01.01, 550 through 562.

IDAPA 58.01.01.608

Open outdoor fires used for the purpose of weed abatement such as along fence lines, canal banks, and ditch banks is an allowable forms of open burning.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF plant policies prohibit open burning of any type on plant property except for fires for weed abatement such as along fence lines, canal banks, and ditch banks. During monthly inspections of plant grounds, the inspector looks for evidence of open burning activities. In the last four years, no evidence of open burning has been found except for fires for weed abatement along fence lines, canal banks, and ditch banks.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to look for evidence of open burning activities during its monthly inspections of plant grounds. Inspection logs will document any findings of evidence of open burning except for fires for weed abatement along fence lines, canal banks, and ditch banks.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Accidental Chemical Release

40 CFR Part 68

Owners/operators of stationary sources subject to risk management program rules shall prepare and register a risk management program in accordance with rules to be adopted by the U.S. EPA.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has completed RMPP planning for the Rexburg Plant in accordance with 40 CFR 68.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Basic American Foods will annually review the status of its RMP program to verify compliance with 40 CFR 68.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Class I and Class II Refrigerants

40 CFR 82, Subpart F

Emissions of class I and class II refrigerants and their substitutes shall be reduced to the lowest achievable level by complying with applicable standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes.

Basis for Determining Current Compliance Status:

BAF has implemented a program to manage Class I and Class II refrigerants in accordance with 40 CFR 82. A review of records for refrigeration units subject to 40 CFR 82 indicates that this facility is in compliance with the requirements of 40 CFR 82.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Basic American Foods will annually review the status of its program to manage Class I and Class II refrigerants to verify compliance with 40 CFR 68.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Permit to Construct Required

IDAPA 58.01.01.201

No owner or operator may commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining a permit to construct from the Department which satisfies the requirements of Sections 200 through 228 unless the source is exempted in any of Sections 220 through 223, the owner or operator complies with Section 213 and obtains the required permit to construct, or the source operates in accordance with all of the applicable provisions of a permit by rule.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

No

Basis for Determining Current Compliance Status:

In May 2003 BAF submitted an Application for Tier II Air Operating Permit for the Rexburg Plant. In May 2004 BAF submitted Revision #1 to this application. In accordance with Provision 9.3 of the existing Tier I Air Operating Permit for the Rexburg Plant, these Applications identified historic changes and modifications to facilities and operations for which BAF should have obtained Permits to Construct. The Applications also included information required under IDAPA 58.01.01.200-223, to enable DEQ to include appropriate terms and conditions for these changes in accordance with. Provision 9.6 of the existing Tier I permit.

BAF has submitted all information needed to remedy noncompliance, and BAF has received draft copies of Tier II permit for the Rexburg Plant. As of the date of this submittal, however, DEQ has not issued a final Tier II Permit. Because BAF has not received a final Tier II permit, BAF has not yet attained compliance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

After DEQ issues the Tier II Permit for the Rexburg Plant, BAF will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF's current operating procedures require an environmental review of all capital projects. Part of the review includes assessing whether a Permit to Construct might be required for the project.

To demonstrate compliance, BAF will annually review capital projects for the

Rexburg Plant to verify that the projects received environmental review

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

The following monitoring requirements apply generically to plant activities.

Performance Testing - Opacity

IDAPA 58.01.01.625

The appropriate test method for monitoring visible emissions under this section shall be EPA Method 9 (contained in 40 CFR Part 60) with the method of calculating opacity exceedances altered as follows:

Opacity evaluations shall be conducted using forms available from the Department or similar forms approved by the Department.

Opacity shall be determined by counting the number of readings in excess of the percent opacity limitation, dividing this number by four (4) (each reading is deemed to represent fifteen (15) seconds) to find the number of minutes in excess of the percent opacity limitation. This method is described in the Procedures Manual for Air Pollution Control, Section II (Evaluation of Visible Emissions Manual), September 1986.

Sources subject to New Source Performance Standards must calculate opacity as detailed above and as specified in 40 CFR Part 60.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

Included in applicable requirement.

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

All opacity readings at the Rexburg Plant are made by certified opacity readers employed by BAF. A review of opacity monitoring logs was completed to verify that opacity readings are made in accordance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Opacity reading logs will be reviewed to confirm all opacity readings were made in accordance with this requirement.

Reporting Methods and Frequencies

Results of visible emissions monitoring will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Fuel Sulfur Content Analysis

IDAPA 58.01.01.725

The reference test method for measuring fuel sulfur content shall be ASTM method, D129-95 Standard Test for Sulfur in Petroleum Products (General Bomb Method) or such comparable and equivalent method approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF does not sell or distribute any fuel oil. The only fuel oil used as part of the "Plant" process is diesel fuel used for internal combustion engines on mobile sources. Because all of this fuel is obtained from commercial suppliers who themselves are subject to this rule, fuel sulfur analyses are not needed.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will verify that any sulfur analyses of fuel conducted for purposes of demonstrating compliance with IDAPA 58.01.01.725 were performed in accordance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

There are no applicable recordkeeping requirements applicable to General Plant Activities.

REPORTING REQUIREMENTS - GENERAL PLANTWIDE ACTIVITIES

There are no applicable reporting requirements applicable to General Plant Activities.

ALL EMISSIONS UNITS (GENERIC)

The "all emissions units (generic)" emissions unit comprises all emissions units at the plant collectively. This emissions unit is associated with air emissions control requirements that apply generically all stack emissions on a plantwide basis.

EMISSION LIMITS - ALL EMISSIONS UNITS (GENERIC)

The following emissions limits apply generically to all plant emissions units.

Visible Emissions

IDAPA 58.01.01.625

No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with the current Tier I facility permit, BAF currently conducts a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. This inspection consists of a see/no see evaluation for each potential source using EPA Method 22. If any visible emissions are present from any point of emission, BAF either takes appropriate corrective action as expeditiously as practicable, or performs a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625.

A review of these records indicates that no visible emissions events were noted from any plantwide process stacks. (Compliance with visible emissions limits for stacks associated with specific plant processes is discussed separately in the applicable requirements summary for each individual process.)

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will annually review logs from plant-wide visible emissions survey to verify compliance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - ALL EMISSIONS UNITS (GENERIC)

The following operating requirements apply generically to all plant emissions units.

Excess Emissions

IDAPA 58.01.01.132

The person responsible for, or in charge of a facility during, an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing such excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of the Department, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.132, 133, 134, 135,136

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has developed and implemented procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to implement its procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF provides routine maintenance and repair of cyclones and baghouses, including periodic inspections.

BAF will annually review information on excess emissions events and review process operations to evaluate feasible alternatives for reducing excess emissions events.

Reporting Methods and Frequencies

BAF will continue to submit excess emissions reports for each excess emission event in accordance with IDAPA 58.01.01.135.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions

IDAPA 58.01.01.133

The owner or operator of a source of excess emissions must make the maximum reasonable effort, including off-shift labor where practicable to accomplish maintenance during periods of nonoperation of any related source operations or equipment.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF does not have any equipment that typically creates an excess emission event during scheduled maintenance.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will review excess emissions records to verify that not plant equipment or emissions units have frequent excess emissions during scheduled maintenance. If any plant equipment or emissions units are identified as frequent sources of excess emissions during scheduled maintenance, BAF will develop a program to ensure that maintenance on these items occurs during process downtime.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit

Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions

IDAPA 58.01.01.134.01

For all equipment or emissions units from which excess emissions may occur during upset conditions or breakdowns or implementation of safety measures, the facility owner or operator shall:

a. Implement routine preventative maintenance and operating procedures consistent with good pollution control practices for minimizing upsets and breakdowns or events requiring implementation of safety measures, and

b. Make routine repairs in an expeditious fashion when the owner or operator knew or should have known that an excess emissions event was likely to occur. Off-shift labor and overtime shall be utilized, to the extent practicable, to ensure that such repairs are made expeditiously.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has developed and implemented procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF routinely reviews information on excess emissions events and reviews process operations to evaluate feasible alternatives for reducing excess emissions events.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to implement its procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF provides routine maintenance and repair of cyclones and baghouses, including periodic inspections.

BAF will annually review information on excess emissions events and review process operations to evaluate feasible alternatives for reducing excess emissions events.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions

IDAPA 58.01.01.134.02

For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.132, 133, 134, 135,136

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has developed and implemented procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will continue to implement its procedures to identify, respond to, document and report excess emissions events in accordance with provisions of IDAPA 58.01.01.132-136. BAF provides routine maintenance and repair of cyclones and baghouses, including periodic inspections.

BAF will annually review information on excess emissions events and review process operations to evaluate feasible alternatives for reducing excess emissions events.

Reporting Methods and Frequencies

BAF will continue to submit excess emissions reports for each excess emission event in accordance with IDAPA 58.01.01.135.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS - ALL EMISSIONS UNITS (GENERIC)

The following monitoring requirements apply generically to all plant emissions units.

Source Testing

IDAPA 58.01.01.157

If a source test is performed to satisfy a performance test requirement or a compliance test requirement imposed by state or federal regulation, rule, permit, order or consent decree, then the test methods and procedures shall be conducted in accordance with the requirements of IDAPA 58.01.01.157. The test must be conducted under operational conditions specified in the applicable state or federal regulation, rule, permit, order, consent decree or by Department approval. If the operational requirements are not specified, the source should test at worst-case normal operating conditions. Worst-case normal conditions are those conditions of fuel type, and moisture, process material makeup and moisture and process procedures which are changeable or which could reasonably be expected to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

All source tests conducted for performance or compliance demonstration purposes have been completed in accordance with the requirements of this section.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As part of BAF's annual compliance review, records of source tests conducted will be reviewed to verify compliance with this section.

Reporting Methods and Frequencies

If performance tests are completed, performance test reports will be summarized in BAF's Semiannual Reports on Emissions Monitoring that are included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c. This is in additional to source test results reporting pursuant to IDAPA 58.01.01.157.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING - ALL EMISSIONS UNITS (GENERIC)

The following recordkeeping requirements apply generically to all plant emissions units.

Excess Emissions Records

IDAPA 58.01.01.133,134,136

The owner or operator shall maintain excess emissions records at the facility for the most recent five (5) calendar year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the following:

An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to Section 135 for the particular emissions unit or equipment; and

Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/safety preventative maintenance plans which have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

Included in requirement.

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF maintains an excess emissions log book in accordance with this requirement. In lieu of maintaining separate books for each piece of equipment, the logs are maintained on a spreadsheet. Records for individual pieces of equipment are retrieved by sorting or filtering the spreadsheet rows by piece of equipment.

Preparation of startup, shutdown, and scheduled maintenance procedures and upset/breakdown/safety preventative maintenance plans is optional.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will annually verify that the log book is being maintained and is current.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS - ALL EMISSIONS UNITS (GENERIC)

The following reporting requirements apply generically to all plant emissions units.

Excess Emissions Reports

IDAPA 58.01.01.133

The owner or operator of a source of excess emissions shall notify the Department of any startup, shutdown, or scheduled maintenance event that is expected to cause an excess emissions event. Such notification shall identify the time of the excess emissions, specific location, equipment involved, and type of excess emissions

event (i.e. startup, shutdown, or scheduled maintenance). The notification shall be given as soon as reasonably possible, but no later than two (2) hours prior to the start of the excess emissions event unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary. The Department may prohibit or postpone any scheduled startup, shutdown, or maintenance activity upon consideration of the factors listed in Subsection 134.03.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

There are no processes at the Rexburg Plant that are expected to create excess emission during startup, shutdown, or scheduled maintenance.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

In its annual review of excess emissions, BAF will review excess emission records to determine if any equipment is prone to excess emissions during startup, shutdown, or scheduled maintenance. If any units are identified, BAF will initiate notification to DEQ of startup, shutdown, and scheduled maintenance.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if

compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions Reports

IDAPA 58.01.01.134

The owner or operator shall notify the Department of any upset/breakdown/safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than twenty-four (24) hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

A review of BAF's logbook for excess emissions indicates that DEQ is being notified of any upset/breakdown/safety event that results in excess emissions.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

In its annual review of excess emissions, BAF will review excess emission records to verify that that DEQ is being notified of upset/breakdown/safety events that results in excess emissions.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Excess Emissions Reports

IDAPA 58.01.01.133, 134, 135

A written report for each excess emissions event shall be submitted to the Department by the owner or operator no later than fifteen (15) days after the beginning of each such event. Each report shall contain the following information:

a. The time period during which the excess emissions occurred;

b. Identification of the specific equipment or emissions unit which caused the excess emissions;

c. An explanation of the cause, or causes, of the excess emissions and whether the excess emissions occurred as a result of startup, shutdown, scheduled maintenance, upset, breakdown or a safety measure;

d. An estimate of the emissions in excess of any applicable emission standard (based on knowledge of the process and facility where emissions data is unavailable);

e. A description of the activities carried out to eliminate the excess emissions; and

f. Certify compliance status with the requirements of Sections 131, 132, 133.01, 134.01 through 134.03, 135, and 136.

g. If requesting consideration under Subsection 131.02, certify compliance status with Sections 131, 132, 133.01 through 133.03, 134.01 through 134.05, 135, and 136.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

A review of BAF's logbook for excess emissions indicates that written reports have been submitted to DEQ for each excess emissions event in accordance with this requirement.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

In its annual review of excess emissions, BAF will review excess emission records to verify that that written reports have been submitted to DEQ for each excess emissions event in accordance with this requirement.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

INDIRECT FIRED COMBUSTION UNITS (GENERIC)

The "indirect fired combustion units (generic)" emissions unit comprises all emissions units at the plant collectively that:

- are *"fuel-burning equipment"* (as defined in IDAPA 58.01.01.006.40); and
- are insignificant emissions units.

This emissions unit is associated with air emissions control requirements that apply generically to fuel burning equipment. Presently, the only combustion units included in this emissions unit are indirect-fired plant space heaters.

EMISSION LIMITS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

The following emissions limits apply generically to all indirect fired combustion units.

Particulate Matter

IDAPA 58.01.01.675 through 681

Particulate matter emissions from fuel burning equipment with a maximum rated input of ten (10) million BTU's per hour or more, and commencing operation on or after October 1, 1979 shall not exceed 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products. Particulate matter emissions from fuel-burning equipment placed in operation prior to October 1, 1979 or with a maximum rated input of less than ten (10) million BTU's per hour, shall not exceed 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.100 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

When two (2) or more types of fuel are burned concurrently, the allowable emission shall be determined by proportioning the gross heat input and emission standards for each fuel.

In determining compliance emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emission of particulate matter

Standard conditions shall be adjusted for the altitude of the source by subtracting one-tenth (0.10) of an inch of mercury for each one hundred (100) feet above sea level from the standard atmospheric pressure at sea level of twenty-nine and ninety-two one hundredths (29.92) inches of mercury.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157; IDAPA 58.01.01.681

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

There are no generic indirect-fired combustion units at the plant with more than 10 MMBtu/hr rated heat input capacity.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will verify that no indirect fired space heaters exceeding 10 MMBtu/hr rated heat input capacity have been installed. If any such units are installed, BAF will document compliance with this standard by emission calculations using AP-42 emission factors.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

There are no applicable operating requirements applicable to indirect-fired combustion Units.

MONITORING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

The following monitoring requirements apply generically to all indirect fired combustion units.

Performance Testing - PM from Fuel Burning Equipment

IDAPA 58.01.01.681

The appropriate test method for particulate matter emissions from fuel-burning equipment shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent method approved in accordance with IDAPA 58.01.0.157.02.d. Test methods and procedures shall also comply with IDAPA 58.01.01.157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

BAF has not been required to conduct performance testing on any generic indirect fired combustion units.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

If required to conduct performance testing on any generic indirect fired combustion unit, BAF will conduct the testing in accordance with this section.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

REPORTING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

There are no reporting requirements applicable to indirect-fired combustion units.

RECORDKEEPING REQUIREMENTS - INDIRECT FIRED COMBUSTION UNITS (GENERIC)

There are no recordkeeping requirements applicable to indirect-fired combustion units.

BOILERS

The Boilers process comprises the three steam boilers. Boiler applicable requirements include requirements that apply to the Kipper Boiler, or that apply to Boilers 1 and 2 in tandem or collectively.

KIPPER BOILER

The discussion below provides information on applicable requirements that apply specifically to the Kipper Boiler.

EMISSION LIMITS – BOILER 1

The following emission limits apply to the Kipper Boiler.

Particulate Matter

IDAPA 58.01.01.676

Particulate matter emissions to the atmosphere from any boiler exhaust shall not exceed 0.05 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal fuel and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood product fuel in accordance with IDAPA 58.01.01.676-677.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Particulate emissions from the Kipper Boiler were measured on July 11 and 12, 1994 using EPA Method 5. Results of those measurements showed particulate emissions of 0.062 gr/dscf at 8% oxygen.

Wood:coal mixtures have not been combusted in the Kipper Boiler except on a trial basis approximately 15 years ago.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

The Kipper Boiler is subject to Compliance Assurance Monitoring rules, 40 CFR Part 64. BAF will demonstrate compliance with this emission through implementation of a compliance assurance monitoring program in accordance with 40 CFR Part 64.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

Results of visible emissions monitoring will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Visible Emissions

IDAPA 58.01.01.625, 4/5/00;

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by this section. This provision does not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this rule.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance is based on quarterly inspections of significant emissions units for visible emissions conducted in accordance with Condition 2.8 of the current Tier I permit. In addition, the BAF Idaho Environmental Superintendent observes the stack for visible emissions during visits to the plant for other activities. Visible emissions records indicate that three excess visible emissions events have been logged since the current Tier I permit was issued. Each of these events was an individual occurrence and was readily resolved.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

The Kipper Boiler is subject to Compliance Assurance Monitoring rules, 40 CFR Part 64. BAF will demonstrate compliance with this emission through implementation of a compliance assurance monitoring program in accordance with 40 CFR Part 64.

BAF will also continue to perform quarterly observations of visible emissions from this stack.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS – KIPPER BOILER

The following operating requirements apply to the Kipper Boiler.

Compliance Assurance Monitoring

40 CFR 64.5

The owner or operator of a facility subject to 40 CFR 64 shall submit to the permitting authority monitoring that satisfies the design requirements of 40 CFR 64.3 and that includes information specified in 40 CFR 64.4. For pollutant specific emissions units not subject to 40 CFR 64.5(a), the owner or operator shall submit the information required under 40 CFR 64.4 as part of an application for renewal of a Part 70 or 71 permit.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

None

Evaluation of Current Compliance

In Compliance Now?

No

Basis for Determining Current Compliance Status:

BAF is not submitting the required Compliance Assurance Monitoring information with this application.

BAF has not yet completed CAM testing for the Kipper Boiler because compliance assurance monitoring was to have been addressed in the Tier II Air Operating Permit that is being prepared for the Rexburg Plant in accordance with terms of the existing Tier I permit. A draft of the Tier II permit was prepared by DEQ in 2004, and the draft permit included provisions for compliance assurance testing and monitoring of the Kipper boiler that would have eliminated the need for Compliance Assurance

Monitoring. BAF submitted comments on the draft Tier II Permit in the fourth quarter of 2004, but a revised draft has not yet been issued by DEQ.

Because the Tier II permit for the Rexburg Plant would have been issued by this time according to the permitting schedule discussed with DEQ, BAF delayed testing the boiler under the provisions of 40 CFR 64. At this time, BAF is scheduling testing of the boiler pursuant to 40 CFR 64. BAF expects to submit the required information by September 30, 2006.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

BAF will submit the required information in accordance with Compliance Schedule.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS – KIPPER BOILER

There are no monitoring requirements that apply specifically to the Kipper boiler.

RECORDKEEPING REQUIREMENTS – KIPPER BOILER

There are no recordkeeping requirements that apply specifically to the Kipper boiler.

REPORTING REQUIREMENTS – KIPPER BOILER

There are no reporting requirements that apply specifically to the Kipper boiler.

BOILERS 1 AND 2

The discussion below provides information on applicable requirements that apply specifically to Boilers 1 and 2.

EMISSION LIMITS – BOILERS 1 AND 2

Particulate Matter

IDAPA 58.01.01.676

Particulate matter emissions to the atmosphere from any boiler exhaust shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas fuel in accordance with IDAPA 58.01.01.676-677.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance is based on emission calculation methods used by DEQ in the permit analysis and from tuning of boilers.

Continuing Compliance Demonstration

Continuing Compliance Certification

These emissions units will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be demonstrated from emission calculation methods used by DEQ in the permit analysis and from tuning of boilers.

Reporting Methods and Frequencies

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I

Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Visible Emissions

IDAPA 58.01.01.625, 4/5/00

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period which is greater than twenty percent (20%) opacity as determined by this section. This provision does not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this rule.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Compliance is based on quarterly inspections of significant emissions units for visible emissions.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Compliance will be based on quarterly inspections of significant emissions units for visible emissions.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

MONITORING REQUIREMENTS – BOILERS 1 AND 2

There are no monitoring requirements that apply specifically to the Kipper boiler.

RECORDKEEPING REQUIREMENTS – BOILERS 1 AND 2

There are no recordkeeping requirements that apply specifically to the Kipper boiler.

REPORTING REQUIREMENTS – BOILERS 1 AND 2

There are no reporting requirements that apply specifically to the Kipper boiler.

PLANT PRODUCTION

PROCESS A

EMISSION LIMITS - PROCESS A

Visible Emissions

IDAPA 58.01.01.625

No person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with the current Tier I permit for the Rexburg Plant (Permit No. 065-00008), BAF conducts a quarterly one-minute observation of each significant emissions point or source in Process A, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, BAF conducts a six-minute observation, using EPA Method 9. The visible emissions evaluation is performed during daylight hours under normal operating conditions.

Since the current Tier I permit was issued, no visible emissions exceeding 10% have been verified from Process A stacks. One observation of a slight visible emission was logged as an excess opacity situation because the observer was not certified to conduct Method 9 observations and no certified Method 9 observer was available to conduct a Method 9 opacity test. The condition associated with this event was readily resolved.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by conducting visible emissions observations as required in the Tier I permit to be issued to the Rexburg Plant. BAF expects that process visible emissions monitoring requirements in the new permit will be the same as those contained in Section 5.3 of the current permit.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

Particulate Matter

IDAPA 58.01.01.700-703

A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979 particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$

If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

Emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emissions of particulate matter.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.700.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

As indicated in Section 3, the Process Weight, PW, for Process A is 30,600 lb/hr. The allowable emission rate, E, is then 18.2 lb/hr. From the emission tables in Appendix C, hourly PM emissions from all Process A stacks is 11.7 lb/hr:

Stack	Emission rate, lb/hr
7020	0.7
7101	2.9
7102	2.9
7019	4.7
7001	0.3
7027	0.1
7006	0.2
Total:	11.7

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As indicated above, Process A will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance. Routine visible emission monitoring proposed to demonstrate compliance with IDAPA 58.01.01.625 will be used to verify that Process A emissions units are functioning normally.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - PROCESS A

There are no operating requirements that are specifically applicable to Process A. Process A emissions units are subject to generic operating requirements included in the Plant Process.

MONITORING REQUIREMENTS - PROCESS A

Performance Testing - Particulate Matter Process Weight Limitations

IDAPA 58.01.01.700.4

The appropriate test method under Sections 700 thought 703 shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent methods approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Particulate emission estimates are based on emission factors developed from EPA Method 5 testing of selected stacks at BAF facilities. These factors are supplemented with additional particulate emission measurements made using a high-volume sampling method (Oregon Method 8 under isokinetic sampling conditions). Protocols for both the EPA Method 5 and Oregon Method 5 testing programs were submitted to and approved by DEQ.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by estimating emissions from emission factors based on Method 5 emission tests and from other emission estimating

procedures acceptable to DEQ, including Oregon Method 8 sampling results.

Reporting Methods and Frequencies

If additional source tests for particulate emissions are conducted, results of these tests will be reported to DEQ in accordance with IDAPA 58.01.01.157.04. In addition, a summary of the results will be included in the next semi-annual report on monitoring data.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - PROCESS A

There are no recordkeeping requirements that are specifically applicable to Process A. Process A emissions units are subject to generic recordkeeping requirements included in the Plant Process.

REPORTING REQUIREMENTS - PROCESS A

There are no reporting requirements that are specifically applicable to Process A. Process A emissions units are subject to generic recordkeeping requirements included in the Plant Process.

PROCESS B

EMISSION LIMITS - PROCESS B

Visible Emissions

IDAPA 58.01.01.625

No person shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.625.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

In accordance with Section 6.3 of the current Tier I permit for the Rexburg Plant (Permit No. 065-00008), BAF conducts a quarterly one-minute observation of each significant emissions point or source in Process B, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, BAF conducts a six-minute observation, using EPA Method 9. The visible emissions evaluation is performed during daylight hours under normal operating conditions.

Since the current Tier I permit was issued, no visible emissions exceeding 10% have been observed from Process B stacks.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by conducting visible emissions observations as required in the Tier I permit to be issued to the Rexburg Plant. BAF expects that process visible emissions monitoring requirements in the new permit will be the same as those contained in Section 6.3 of the current permit.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if

compliance cannot be certified, will provide an appropriate compliance schedule.

Particulate Matter

IDAPA 58.01.01.700-703

A person shall not discharge to the atmosphere from any source operating prior to October 1, 1979 particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

If PW is less than 17,000 lb/hr, $E = 0.045(PW)^{0.6}$

If PW is equal to or greater than 17,000 lb/hr, $E = 1.12(PW)^{0.27}$

Emissions shall be averaged according to the following, whichever is the lesser period of time:

- One (1) complete cycle of operation; or
- One (1) hour of operation representing worst-case conditions for the emissions of particulate matter.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.700.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

As indicated in Section 3, the Process Weight, PW, for Process B is 70,000 lb/hr. The allowable emission rate, E, is then 22.8 lb/hr. From the emission tables in Appendix C, hourly PM emission rate from all Process B stacks is 11.3 lb/hr:

Stack	Emission rate, lb/hr
5034	0.1
5037	1.7
4000	2.0
228	1.3

Stack	Emission rate, lb/hr
234	0.4
311	0.3
312	0.3
410/411	0.7
613/614	1.3
615/616	1.0
638	0.3
707	0.0
725	0.0
8	0.0
5001	0.5
5000	0.0
432	0.0
322	0.5
572	0.8
Total:	11.3

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

As indicated above, Process B will not exceed the process weight rate limits at the input rate. Therefore, no throughput monitoring or recordkeeping is required to demonstrate compliance. Routine visible emission monitoring proposed to demonstrate compliance with IDAPA 58.01.01.625 will be used to verify that Process B emissions units are functioning normally.

Reporting Methods and Frequencies

Monitoring data reports will be included in Semiannual Reports on Emissions Monitoring, in accordance with provisions of the Tier I permit (IDAPA 58.01.01.322.08.c.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

OPERATING REQUIREMENTS - PROCESS B

There are no operating requirements that are specifically applicable to Process B. Process B emissions units are subject to generic operating requirements included in the Plant Process.

MONITORING REQUIREMENTS - PROCESS B

Performance Testing - Particulate Matter Process Weight Limitations

IDAPA 58.01.01.700.4

The appropriate test method under Sections 700 thought 703 shall be EPA Method 5 contained in 40 CFR Part 60 or such comparable and equivalent methods approved in accordance with Subsection 157.02.d. Test methods and procedures shall comply with Section 157.

Enforceability

Federally Enforceable

Applicable Monitoring, Recordkeeping and Reporting Requirements

IDAPA 58.01.01.157.04

Evaluation of Current Compliance

In Compliance Now?

Yes

Basis for Determining Current Compliance Status:

Particulate emission estimates are based on emission factors developed from EPA Method 5 testing of selected stacks at BAF facilities. These factors are supplemented with additional particulate emission measurements made using a high-volume sampling method (Oregon Method 8 under isokinetic sampling conditions). Protocols for both the EPA Method 5 and Oregon Method 5 testing programs were submitted to and approved by DEQ.

Continuing Compliance Demonstration

Continuing Compliance Certification

This emissions unit will continue to comply with this applicable requirement.

Methods of Demonstrating Continuing Compliance

Continuing compliance will be demonstrated by estimating emissions from emission factors based on Method 5 emission tests and from other emission estimating procedures acceptable to DEQ, including Oregon Method 8 sampling results.

Reporting Methods and Frequencies

If additional source tests for particulate emissions are conducted, results of these tests will be reported to DEQ in accordance with IDAPA 58.01.01.157.04. In addition, a summary of the results will be included in the next semi-annual report on monitoring data.

BAF will report compliance with this requirement in its Annual Tier I Permit Compliance Report, as described in IDAPA 58.01.01.322.11. The Annual Tier I Permit Compliance Report will either certify compliance with this requirement, or if compliance cannot be certified, will provide an appropriate compliance schedule.

RECORDKEEPING REQUIREMENTS - PROCESS B

There are no recordkeeping requirements that are specifically applicable to Process B. Process B emissions units are subject to generic recordkeeping requirements included in the Plant Process.

REPORTING REQUIREMENTS - PROCESS B

There are no reporting requirements that are specifically applicable to Process B. Process B emissions units are subject to generic recordkeeping requirements included in the Plant Process.